

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JOSEPH FRAPANPINA III on behalf of)
Himself and all other similarly situated,)
Plaintiff,) Case No. 19-cv-00493
)
v.) Judge John Robert Blakey
)
GARDA CL GREAT LAKES, INC.,) Magistrate Judge Michael T. Mason
)
Defendant.)

**JOINT MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT AND
CERTIFICATION OF A SETTLEMENT CLASS**

The parties, by their respective counsel, move this Court to preliminarily approve the negotiated settlement and certify a settlement class. In support of this Motion, the parties incorporate herein by reference the Memorandum in Support filed contemporaneously with this motion.

Dated: October 22, 2021

Respectfully submitted,

GARDA CL GREAT LAKES, INC.

JOSEPH FRAPANPINA

By: /s/ Mark L. Shapiro

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